

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

	X	
	:	
	:	
In re	:	Chapter 11
	:	
TERRAFORM LABS PTE. LTD.,	:	Case No. 24-10070 (BLS)
	:	
Debtor.¹	:	
	:	Re: Docket No. 60
	X	

**NOTICE OF FILING OF REVISED PROPOSED ORDER GRANTING
APPLICATION OF DEBTOR FOR ENTRY OF AN ORDER AUTHORIZING
THE RETENTION AND EMPLOYMENT OF DENTONS US LLP AS SPECIAL
COUNSEL TO THE DEBTOR AND DEBTOR IN POSSESSION,
EFFECTIVE AS OF THE PETITION DATE**

PLEASE TAKE NOTICE that, on February 13, 2024, Terraform Labs Pte. Ltd., as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), filed the *Application of Debtor for Entry of an Order Authorizing the Retention and Employment of Dentons US LLP as Special Counsel to the Debtor and Debtor in Possession Effective as of the Petition Date* [Docket No. 60] (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached to the Application as Exhibit A was a proposed form of order granting the relief sought therein (the “**Proposed Order**”).

PLEASE TAKE FURTHER NOTICE that the Debtor received objections to the relief requested in the Application from the U.S. Securities and Exchange Commission [Docket No. 86], the Office of the United States Trustee for the District of Delaware [Docket No. 103], and the Official Committee of Unsecured Creditors [Docket No. 140], as supplemented by Docket No. 163 (the “**UCC Objection**”).

¹ The Debtor’s principal office is located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

PLEASE TAKE FURTHER NOTICE that the Debtor hereby files a revised version of the Proposed Order (the “**Revised Order**”) resolving the UCC Objection. The Revised Order is attached hereto as **Exhibit 1**. For the convenience of the Court and all interested parties, attached hereto as **Exhibit 2** is a blackline comparing the Revised Order against the Proposed Order.

PLEASE TAKE FURTHER NOTICE that the Debtor intends to present the Revised Order at the hearing currently scheduled for **March 12, 2024 at 10:00 a.m. (ET)** (the “**Hearing**”) before The Honorable Brendan L. Shannon at the Court, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE that to the extent that the Revised Order is further revised, the Debtor will present a blackline copy of such revised document to the Court either at or before the Hearing.

[Remainder of page intentionally left blank]

Dated: March 12, 2024
Wilmington, Delaware

/s/ Matthew P. Milana

RICHARDS, LAYTON & FINGER, P.A.

Paul N. Heath (No. 3704)

Zachary I. Shapiro (No. 5103)

Matthew P. Milana (No. 6681)

One Rodney Square

920 North King Street

Wilmington, Delaware 19801

Telephone: (302) 651-7700

Email: heath@rlf.com

shapiro@rlf.com

milana@rlf.com

-and-

WEIL, GOTSHAL & MANGES LLP

Ronit Berkovich (admitted *pro hac vice*)

Jessica Liou (admitted *pro hac vice*)

F. Gavin Andrews (admitted *pro hac vice*)

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Email: ronit.berkovich@weil.com

jessica.liou@weil.com

f.gavin.andrews@weil.com

*Attorneys for Debtor
and Debtor in Possession*